

**Richmond L. Williams**  
Chief Legal Counsel - Environmental Litigation  
Law Department

Ashland Inc.  
1313 N. Market Street  
Wilmington, DE 19894  
302-594-7020 (phone)  
302.654-7554 (fax)  
rlwilliams@ashland.com

**VIA FEDERAL EXPRESS DELIVERY**

**March 24, 2010**

**Tom Perina**  
**CH2M Hill**  
**2280 Market Street, Suite 200**  
**Riverside, CA 92501**

**Re: Omega Chemical Corporation Superfund Site Operable Unit 2  
Response to 104(e) Information Request Related to Wells**

**Dear Mr. Perina:**

The following is in response to the 104(e) Request for Information ("RFI") of the United States Environmental Protection Agency ("EPA") directed to Ashland Inc. ("Ashland") regarding the Omega Chemical Corporation Superfund Operable Unit 2 site (the "Site").

Ashland understands that the RFI is intended to seek information to assist EPA with determining the extent of groundwater contamination emanating from the Site, possible current and future impacts on groundwater users in the vicinity of OU-2, and to identify parties that have or may have contributed to contamination at the Site. While Ashland is providing EPA with information requested in the RFI, it is Ashland's position that it has resolved its liability at the Site as an Option A settler pursuant to the terms of the De Minimis Administrative Order on Consent, U.S. EPA Region IX Docket No. 2004-13, effective December 2005.

Ashland is aware that any subsequent information responsive to the RFI which may become known or available after submission of Ashland's response must be provided to EPA.

## RESPONSES TO EPA'S INFORMATION REQUEST

1. State the full legal name, address, telephone number, position(s) held by and tenure of the individual(s) answering any of these questions on behalf of Ashland Inc. concerning its well(s).

### RESPONSE:

Taras Kruk  
Principal  
URS Corporation  
2020 East First Street, Suite 400  
Santa Ana, CA 92705

Mr. Kruk has been employed as a consultant on behalf of Ashland since December 2004 involving the Ashland wells that are subject of this RFI.

EPA should contact the undersigned, Richmond L. Williams, with any questions regarding Ashland's response to this RFI.

2. Provide the location of the footing well(s):
  - 3S/11 W-05G02S (a.k.a. EX-1)
  - 3S/11 W-05G03S (a.k.a. EX-2)and any other well(s) owned or operated by Ashland Inc. in the vicinity (i.e. within five miles) of such well(s). Provide the location in the form of survey coordinates or, if available, a map prepared by a state certified surveyor.

### RESPONSE:

See "Well Survey Data" Folder: Well Survey Data Coordinates.xls & Well Survey Figure.pdf on the enclosed CD marked as ASH00001.

The response to Question No. 2 was prepared by Taras Kruk, Principal, URS Corporation.

3. For each well identified in Question 2 above, provide the depth from the ground surface at the location of such well to the top of the screened (perforated) interval. Also provide the depth from the ground surface to the bottom of the screened interval. If there is more than one screened interval for a single well, provide the depths for each screened interval.

**RESPONSE:**

See "Well Construction Logs" Folder: Well Construction Summary Table.pdf GW Extraction Wells.pdf & GW Monitoring Wells.pdf on the enclosed CD marked as ASH00001.

The response to Question No. 3 was prepared by Taras Kruk, Principal, URS Corporation.

4. Provide the diameter of all casings and screens associated with each well identified in Question 2 above.

**RESPONSE:**

See "Well Construction Logs" Folder: GW Extraction Wells.pdf & GW Monitoring Wells.pdf on the attached CD marked as ASH00001.

The response to Question No. 4 was prepared by Taras Kruk, Principal, URS Corporation.

5. Provide the ground surface elevation at each well identified in Question 2, and the elevation of the top of the casing at each such well.

**RESPONSE:**

See "Well Survey Data" Folder: Well Survey Coordinates.xls & Well Survey Figure.pdf on the attached CD marked as ASH00001.

The response to Question No. 5 was prepared by Taras Kruk, Principal, URS Corporation.

6. Provide the year that each well identified in Question 2 was installed.

**RESPONSE:**

See "Well Construction Logs" Folder: GW Extraction Wells.pdf & GW Monitoring Wells.pdf on the attached CD marked as ASH00001.

The response to Question No. 6 was prepared by Taras Kruk, Principal, URS Corporation.

7. Provide the current and historical water production (e.g., monthly production)(in gallons per minute, gallons per month, or acre-feet per month) from each well identified in Question 2. Please provide the data on a CD in an electronic, database-compatible format (such as mdb, dft, xls, but no as pdf), if available.

**RESPONSE:**

See "Well Production" Folder: GW Extraction Well Pumping Rates.xls on the attached CD marked as ASH00001.

The response to Question No. 7 was prepared by Taras Kruk, Principal, URS Corporation.

8. Provide the current and historical depth to water below the top of casing (in feet) for each well identified in Question 2. Provide the data on a CD in an electronic, database-compatible format (such as mdb, dft, xls, but no as pdf), if available.

**RESPONSE:**

See "GW Monitoring Results" Folder: Historical GW Levels. Xls on the attached CD marked as ASH00001.

The response to Question No. 8 was prepared by Taras Kruk, Principal, URS Corporation.

9. State whether or not (name of addressee) plans to modify (increase or decrease) the current production rate(s) identified in Question 7, and describe the nature of the plan(s), if any.

**RESPONSE:**

Ashland states that its plans are to increase the combined production rate to 50 gpm with additional rehabilitation and/or converting one or more monitoring wells to extraction.

The response to Question No. 9 was prepared by Taras Kruk, Principal, URS Corporation.

10. State whether or not (name of addressee) plans to install one or more additional wells in the vicinity (i.e., within five miles) of the well(s) identified in Option 2, and describe the nature of these plans, if any.

**RESPONSE:**

See "Future Well Construction Plans" Folder: 10-0119 Response to RWQCB Apprvl.pdf on the attached CD marked as ASH00001.

The response to Question No. 10 was prepared by Taras Kruk, Principal, URS Corporation.

11. Provide a copy of all boring logs, driller's logs, down-hole geophysical logs, and spinner logs pertaining to each well identified in Question 2. EPA is not request down-hole video logs.

**RESPONSE:**

See "Well Construction Logs" Folder: GW Extraction Wells.pdf & GW Monitoring Wells. pdf on the attached CD marked as ASH00001.

The response to Question No. 11 was prepared by Taras Kruk, Principal, URS Corporation.

12. For each well identified in Question 2, provide a copy of all water quality and/or laboratory analytical results and reports for any samples taken of extracted groundwater (prior to any treatments). Such results and reports must include all analytes samples or tested. In addition to copies of laboratory reports (in doc or pdf.), please provide the data on a compact disc in a database compatible electronic format (such as mdb, dft, xls), if available.

**RESPONSE:**

See "GW Monitoring Results" Folder: Historical Analytical.xls & "2009 2<sup>nd</sup> Semester Monitoring" Folder: S209\_Monitoring\_Rpt.final.pdf on the attached CD (ASH00001).

The response to Question No. 12 was prepared by Taras Kruk, Principal, URS Corporation.

Tom Perina  
CH2M Hill  
March 24, 2010

13. Describe any contamination and/or hazardous substances, or any evidence suggesting the possible presence of contamination and/or hazardous substances, which may have been or is/are present at the location of the well(s) identified in Question 2, including groundwater such as well(s).

**RESPONSE:**

See "2009 2<sup>nd</sup> Semester Monitoring" Folder: S209\_Monitoring\_Rpt.fnal.pdf on the attached CD marked as ASH00001.

The response to Question No. 13 was prepared by Taras Kruk, Principal, URS Corporation.

In replying to this RIF, Ashland has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of the RFI or any other matter. If following your review, EPA has any questions concerning any response herein, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. L. Williams", with a horizontal line extending from the end of the signature.

Richmond L. Williams  
Chief Counsel, Environmental Litigation

RLW/mad

Attachments

From: Origin ID: CMHA (614) 790-3220  
 Carol Steele  
 Ashland Inc  
 5200 Blazer Parkway  
 Dublin, OH 43017



Ship Date: 24MAR10  
 ActWgt: 1.0 LB  
 CAD: 8902457/NET3010

Delivery Address Bar Code



SHIP TO: (614) 790-3319

BILL SENDER

**Tom Perina**  
**CH2M Hill**  
**2280 MARKET ST STE 200**  
  
**RIVERSIDE, CA 92501**

Ref #  
 Invoice #  
 PO #  
 Dept #



TRK# 7933 8549 9802  
 0201

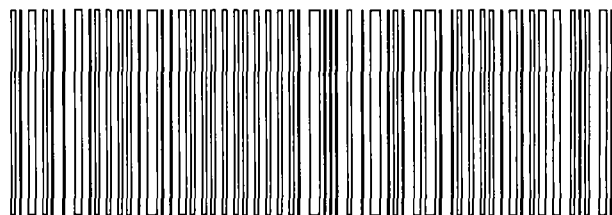
THU - 25 MAR A1  
 PRIORITY OVERNIGHT

92501

CA-US

ONT

X2 ONTA



505G1F6525708

**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

## UNSCANNABLE MEDIA

To use the unscannable media document # 222 7207  
contact the Region IX Superfund Records Center